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January 30, 2025

Via ECF

Hon. Lewis J. Liman
United States District Court
Southern District of New York
500 Pearl Street, Room 1620
New York, NY 10007

**Re: *Lively v. Wayfarer Studios LLC et al.*, No. 1:24-cv-10049-LJL;
rel. *Jones et al. v. Abel et al.*, No. 1:25-cv-00779-LJL**

Dear Judge Liman:

As counsel for Wayfarer Studios LLC, Justin Baldoni, Jamey Heath, Steve Sarowitz, It Ends With Us Movie LLC, Melissa Nathan, The Agency Group PR LLC, and Jennifer Abel (collectively, the “Wayfarer Parties”), we write to advise the Court of an issue that the Wayfarer Parties wish to address at the upcoming conference on Monday, February 3, 2025.

During a conference of the parties’ counsel on January 30, 2025, counsel for the Wayfarer Parties requested the earliest possible deposition of Blake Lively. Counsel for Ms. Lively and Ryan Reynolds (the “Lively Parties”) stated their objection to the Wayfarer Parties’ lead counsel conducting the deposition of Blake Lively. Specifically, the Lively Parties’ counsel indicated that they object to Bryan J. Freedman, personally, taking Ms. Lively’s deposition, based upon unspecified statements made by Mr. Freedman. When asked to elaborate on the grounds for their objection, counsel for the Lively Parties declined to do so.

Counsel for Ms. Lively has made clear that Ms. Lively does not want Mr. Freedman to be the attorney who takes her deposition. We are unaware of any situation that would warrant the deposed party to have a choice in which attorney takes her deposition. Parties to litigation simply do not have the right to dictate which of their opponents’ attorneys may or may not take their deposition or perform any other aspect of the opposing party’s case.

The Wayfarer Parties respectfully submit that this important issue should be discussed at the Initial Pretrial Conference pursuant to Rule 26(f)(3)(c) of the Federal Rules of Civil Procedure. Pursuant to the Court’s Individual Practices in Civil Cases, we respectfully identify this as an area where the parties do not agree and ask that the Court address the matter at the February 3 conference.

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We look forward to further discussing this matter at the Initial Pretrial Conference scheduled for February 3, 2025.

Respectfully submitted,

Kevin Fritz

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cc: all counsel of record (via ECF)